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11 *Attorneys for Defendants*
HYNIX SEMICONDUCTOR INC. and
12 HYNIX SEMICONDUCTOR AMERICA INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 In re DYNAMIC RANDOM ACCESS
17 MEMORY (DRAM) ANTITRUST
18 LITIGATION

19 This Document Relates to:

20 STATE OF NEW YORK,

21 Plaintiff

22 v.

23 MICRON TECHNOLOGY, INC., et
24 al.,

25 Defendants.

Master File No. M-02-1486 PJH
MDL. No. 1486
Case No. C 06-6436 PJH

Assigned for all purposes to the
Hon. Phyllis J. Hamilton

JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
DEFENDANTS' RESPONSE DATE TO
PLAINTIFF THE STATE OF NEW
YORK'S AMENDED COMPLAINT

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28 LA2:859356.2

1 Plaintiff the State of New York and Defendants Elpida Memory, Inc. and
2 Elpida Memory (USA) Inc. (collectively "Elpida"), Infineon Technologies AG and
3 Infineon Technologies North America Corp. (collectively "Infineon"), Hynix
4 Semiconductor Inc. and Hynix Semiconductor America Inc. (collectively "Hynix"),
5 Micron Technology, Inc. and Micron Semiconductor Products, Inc. (collectively
6 "Micron"), Mosel Vitelic Inc. and Mosel Vitelic Corp. (collectively "Mosel"), Nanya
7 Technology Corp. and Nanya Technology Corp. USA (collectively "Nanya"), and NEC
8 Electronics America, Inc., by and through their counsel, jointly submit this stipulation
9 regarding Defendants' response, whether by answer or motion, to Plaintiff the State of
10 New York's Amended Complaint filed with the Court on October 1, 2007.

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12 WHEREAS, the Court issued an order on April 15, 2008 denying
13 Defendants' Motion to Dismiss; and

14
15 WHEREAS, the Defendants' response, whether by answer or motion, to
16 Plaintiff's Amended Complaint is currently due on April 29, 2008.

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18 THEREFORE, IT IS HEREBY STIPULATED by the parties, by and
19 between their counsel and subject to Court approval, that without waiving the right to
20 assert any and all defenses available to Defendants, Defendants will respond, whether by
21 answer or motion, to the Amended Complaint by May 13, 2008.

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1 Dated: April 28, 2008

2 ANDREW CUOMO
3 Attorney General of the State of New York
4 JAY L. HIMES
5 RICHARD L. SCHWARTZ
6 JEREMY R. KASHA

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7 By: /s/ Richard L. Schwartz
Richard L. Schwartz

By: /s/ Steven H. Bergman
Steven H. Bergman

8 *Attorneys for Plaintiff State of New York*

*Attorneys for Hynix Semiconductor Inc.
and Hynix Semiconductor America Inc.
and, for purposes of this stipulation only,
signing with permission of all other
defendants*

12 **ATTESTATION OF FILING**

13 Pursuant to General Order No. 45 § X(B), I hereby attest that I have obtained
14 concurrence in the filing of this Joint Stipulation and [Proposed] Order Regarding
15 Defendants' Response Date to Plaintiff's Amended Complaint from all of the parties
16 listed in the signature blocks above.
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18 By: /s/ Steven H. Bergman
19 Steven H. Bergman
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[PROPOSED] ORDER

Pursuant to the Stipulation of the parties, the Court hereby orders that Defendants respond to Plaintiff's Amended Complaint, by answer or by motion, by May 13, 2008.

MAY 2
Dated: ~~April~~ _____, 2008

